

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Modernizing the E-Rate Program for)	WC Docket No. 13-184
Schools and Libraries)	

ALABAMA
STATE DEPARTMENT OF EDUCATION
COMMENTS



Introduction

The Alabama Department of Education (ALSDE) serves 134 Public School Systems located in the State of Alabama. Our schools consist of 744,637 students and 46,089 teachers. The ALSDE recognizes the importance of the E-Rate and has been involved with the Schools and Libraries Universal Support Mechanism (E-Rate) program since its inception. The ALSDE has, and will continue to, provide a staff State E-Rate Coordinator. That office will provide daily E-Rate assistance, major statewide annual E-Rate training events and other development services that have E-Rate influence, application and/or implications. The State E-Rate Coordinator is actively involved with the State E-Rate Coordinators Alliance (SECA) as well as the State Educational Technology Directors Association (SETDA). Though our focus in this response is on the Public K-12 Schools and School Systems in the State, it is important to note that the ALSDE recognizes that our private schools and public libraries are also eligible and do participate in the E-Rate Program as well. The ALSDE has collaborated with the public libraries in various training events and will continue to support these entities and private schools for any future identified needs.

The ALSDE would like to provide comments to the FCC's NPRM, WC Docket No. 13184. Like many States and the schools and school systems they represent, we also applaud the success of the Schools and Libraries Universal Support Mechanism (E-rate) program since its inception. Our State Board of Education recently approved the Alabama State Department of Education's Plan 2020. Our vision statement for this plan is "Every Child A Graduate - Every Graduate Prepared for College/Work/Adulthood in the 21st Century". A "Prepared Graduate" is defined as a graduate that "...possesses the knowledge and skills needed to enroll and succeed in credit-bearing, first-year courses at a two- or four-year college, trade school, technical school, without the need for remediation' and

“...possesses the ability to apply core academic skills to real-world situations through collaboration with peers in problem solving, precision, and punctuality in delivery of a product, and has a desire to be a life-long learner.” The statewide objective for schools and school systems is that “Schools and Systems are resourced to create a 21st century learning environment for their students including infrastructure, building renovation/improvements, and technology.” Upon reflection of the other fifteen statewide objectives for schools/systems, professionals, support systems and learners and the associated strategies and measures of success, it is clear that technology has a very firm impact through direct application and indirect support. As we embark on the mission of our Plan 2020 efforts, we recognize the importance that the E-rate program has in our mission and understand that to further meet the rapid changes in the technology needs of our students, teachers and administrators across the State of Alabama. We, along with many States and interested organizations, recognize the role E-Rate has traditionally played in the influx of technology in our schools but realize that these technology needs are rapidly changes and the E-Rate successful as it is due for a modern upgrade.

The support that the E-rate provides, and will continue to provide, is critical for the success of our Plan 2020. There is no doubt that technology is an important component to the 21st Century. Even with the success of the program to date, the refocussing of E-rate to allow Alabama public and non-public school students and public library patrons to become proficient in digital literacy is long overdue. Before looking at the modern upgrade of the E-rate program, it is important to understand the program’s positive influence, past and present, within our schools, school systems and statewide.

The Alabama State Department of Education has actively participated in the E-rate program from a State’s perspective on a large scale since the beginning of the program. We supported and continue to support our Statewide Consortium directed by Alabama Supercomputer Authority (ASA) through their Alabama Research and Education Network (AREN) that provides Internet access for Alabama state government, four-year universities, two-year colleges, K-12 schools, and libraries. Through guidance and

assistance of the ALSDE, the consortia's objective is to currently provide Internet access to all school systems with a focus upon the high schools. The success of ASA's lead in this project has led to the provision of Internet access of 1.5M per school system during the initial years of the E-rate program up to 500M of Internet access transport bandwidth with an average of approximately 100M per district today. Additionally, the consortia provides for the distribution of "13Gbps Shared Internet Access and Basic Technical Support Services for 138 School Systems" (includes four non-traditional systems recognized by the ALSDE) depending on the needs of broadband by the district. It is expected that the broadband needs of the school districts will increase exponentially as funding and technologically advanced programs come along that are designed to support the increase in school districts' needed devices such as, but not limited to, cloud computing, innovative software and web based solutions for the classroom that require extensive high speed broadband and Internet access. The current capacity provided to our schools through AREN must increase exponentially.

The ALSDE support of the E-rate application effort of our individual schools and school systems. Though the consortia application is a part of the E-Rate effort in nearly every school and library in Alabama, our individual schools and libraries make individual E-rate applications as well. In FY2013 a total of 2136 Form 471 applications were filed, 65% of which were filed by either a school district or individual school. ALSDE provides the staff of Universal Service Administrative Company (USAC) assistance in data provisions, various verifications as needed and other informational needs for the application process. The AREN consortia, along with the individual applications, has supported statewide mechanisms for many services, both seen and unseen, that are crucial in meeting statewide and school district goals. AREN supports our Alabama Connecting Classrooms, Educators, and Students Statewide program, commonly known as ACCESS, within the school system's high schools. ACCESS provides the opportunity for all Alabama High School Students to access additional courses and electives not available within their school. The program uses videoconferencing, an anytime, anywhere, web based learning management

system and a combination of both resulting in blended learning capabilities. The ALSDE through State legislature has funded ACCESS with additional support of E-Rate discounts since 2004. The ACCESS Distance Learning Initiative has become a cornerstone in providing equitable education to ALL Alabama public school students in a cost-effective model regardless of their zip codes. The program has a unique method in their provision of distance learning opportunities and has a growing success rate. For example, during the past three years over 88 thousand courses have been completed by Alabama students through both web based courses, video conferencing and a combination of both methods. Over nine thousand students have enrolled in foreign language courses including, but not limited to, Mandarin Chinese, French, and Spanish. Over 62 thousand individual students have taken courses, and, in most cases, these courses were not available to them in their attending schools. Annually the E-Rate discount applications submitted by the consortia amount to an average of \$9.5 million in Commitment Requests. All school districts participate through this program as the ALSDE covers the required E-rate match rendering this bandwidth to the district at no cost. In most schools and school districts Internet access through the consortia applications is the sole provision of Internet access. If the support from E-rate is not available, then, the ACCESS program would be discontinued due to its heavy reliance on Internet access and connectivity,

ACCESS is just one of the many student resources used by our schools and school systems through the consortia network. All Alabama students have access to our Alabama Virtual Library. "The Alabama Virtual Library provides all students, teachers, and citizens of the State of Alabama with online access to essential library and information resources. It is primarily a group of online databases that have magazine, journal, and newspaper articles for research. Through the AVL, an equitable core of information sources is available to every student and citizen in Alabama, raising the level of excellence in schools and communities across the state." Students use this resource daily for their curricula needs over Internet access provided with E-rate discounts.

In 2008, the Alabama Board of Education adopted a Technology Education Course of Study for K-12 students. All Alabama students are required to meet this course of study which is enriched with Internet resources. Additionally, the requirements for CIPA are addressed as well. All high school students are required to take at least one online course or online experience prior to graduation.

Through the use of Internet access, the teachers and students in our State have access to a world of curriculum support and materials. The Alabama Learning Exchange provided by the ALSDE provides resources for teachers to access course of study correlated lesson plans and other instructional materials designed for Alabama students. As supporting resources within this project become more and more innovative, broadband needs will increase.

The AREN also provides a mechanism for statewide education data to be submitted to the ALSDE. This data is collected from each school district nightly and used by the ALSDE to provide for multiple data reporting requirements for the USDOE in order to maintain Federal Funding among other data requests through the EDEN/EDFacts program. The ALSDE provides a statewide student management system for all public schools and school systems. The use of this statewide student management system provides for a more consistent, valid and accurate upload of data to the ALSDE's data systems. Data is also collected for Assessment purposes and used constantly by teachers, administrators and students to review progress of achievement at student, school, school system and State levels.

The aforementioned examples highlight the value of Internet access and its resources for students, teachers and other education staff in our schools and school systems. With regard to the NPRM response, these services have the common thread of Internet availability for all Alabama schools. Without the availability of Internet access, connectivity and supporting technologies, some E-rate eligible and some not, these technology infused services may have been impossible to provide on a

statewide effort. As the need for speed of information services and deeper learning efforts increase, the power of the Internet will increase as well. It is imperative that the E-rate program support these needs but not deviate from the founding principles of the program.

E-rate has and will continue to have a critical supporting role to our vision: “Every Child A Graduate - Every Graduate Prepared for College/Work/Adulthood in the 21st Century”.

The ALSDE encourages the FCC to fundamentally consider several general ideas or concepts concerning the impending positive changes of the E-Rate program to meet the changing needs of our school and school systems with the focus upon the various levels of uniqueness of every school, school district and State.

Collaboration

Most State Departments of Education have experience in dealing with individual State Laws affecting the schools and school systems within their oversight. Notwithstanding the levels of “local control” apparent in most States, the State Education Agencies (SEA) work with each participating Local Education Agency (LEA) in support of seeking funding for their individual schools in all areas of operation and curriculum delivery. The SEAs have experience in working closely with the USDOE in the oversight of various Federal funding sources and programs. These four entities - Schools, LEAs, SEA and the USDOE - collaborate in the best interest and needs of the students. When possible, the FCC should seek collaboration with these entities in matters of development and E-rate program management. The SEAs work closely with the school districts and schools. The FCC may find valuable and cost effective assistance and ideas from SEAs in matters of ensuring schools and libraries have affordable access to 21st century broadband that supports digital learning, maximizes the cost effectiveness of E-Rate funds, streamlines the administration of the E-rate program among other State related contributions to help meet the needs of their students through the E-Rate program. It is apparent that every State is different

in some manner. Some states have different bid laws, educational administrative codes, and geographical/environmental elements ; therefore, a one size fits all method of distributing the E-rate discount funds may be inefficient or in some manner conflicting with State laws..

Need and Accountability

School systems that have clear plans, short term and long term, for the implementation and knowledge of technology innovations and tools including but not limited to, professional development, curriculum support, HSB and connectivity generally are cognizant of their unique needs. The FCC should consider this in research of various submissions that state otherwise. SEAs should continue to provide guidance in the technology needs of schools and school systems through planning requirements. As referred to earlier, SEAs who work closely in support of the LEAs and their schools have already developed a rapport and sense of teamwork in helping LEAs reach goals and objectives whenever possible. As the FCC considers program improvement and the possibility of raising the cap for the E-rate program, some level of accountability for funding should be considered. The planning tools that SEAs and schools have in place would be an important aspect of accountability. Notwithstanding comment from those entities that are not familiar with the education process, the term “plan” is not new to the field of education and the reinstatement of the LEA and School Technology Plans (or similar planning tools) by the FCC, in an effort to provide an additional level of accountability, should be acceptable. However, we would suggest that the FCC work closely with the USDOE and the SEAs to determine what modifications are needed and provide guidance. The SEAs are already accustomed to the data needs of the USDOE through NCES and EDFacts initiatives, and the FCC should work with the USDOE in the determination and use of current data available and any new data to be collected.

The FCC should develop a clear plan including data governance policies for the E-rate program and make this plan publically available for all stakeholders.

Specific items of interests:

Due to the length of this specific NPRM, the ALSDE will make use of the FCC's Reply Comment Period if applicable. However, the following items are a short bulleted list summary of items or concepts of interest:

- The FCC should focus on the current needs of the schools and libraries as determined by the schools and libraries in regards to the E-rate program funding. The FCC should seek the collaboration of their own and other funding programs for similar services as well as various State Agencies and corporate interests when possible to prevent duplication of services.
- The FCC should modify the current ESL to favor HSB services and equipment. This may include placing some traditional Priority 2 services for LAN related equipment into a higher level of priority, therefore, the FCC should consider modifying the Priority of services and equipment.
- The FCC may consider lowering the discounts available as long as such an event provides equitable access to HSB.
- The ALSDE has and will continue to support Statewide Purchasing efforts as a true means of seeking volume pricing. However, the FCC should review current policies regarding effective State Laws with respect to contract lengths and other bidding concerns at the State and LEA level. The ALSDE has and will continue to support the current statewide consortia with additional support by providing the match. The ALSDE will seek additional similar support for any statewide E-rate effort to improve needed student access Internet through HSB.

- The FCC should trim the ESL to meet the program goals and objectives. The FCC should redirect the ESL document into an easily understood document that will not lead to multiple translations for a single described product or service.
- The ALSDE supports a complete rework of the online application system to a more modern portal that will allow applicants to understand where they are in the application process and provide guidance throughout the application process as well as reports on demand.
- The ALSDE also supports possible reduction in discount levels and flat discounts for all applicants for certain eligible products and services.
- The ALSDE does not support a one size fits all approach to E-rate discount funding including, but not limited to, the setting of budget limits or simplified allocation of funds as described within the NPRM.
- In matters such as gifting and procurement procedures as well as other rules that coincide or contradict with State Laws, that may include transparency requirements, and or Administrative Code the FCC should give more latitude to the State laws. This may require more State involvement in the application process. The ALSDE would be willing to work with the FCC to assist and streamline the application process where applicable.
- The ALSDE agrees that some form of a temporary and/or a certain level of permanent increase to the E-rate Cap may be necessary to meet the HSB but caution the crux of the matter may be wider than just E-rate and the USF. The FCC should expect accountability in all phases of the funding.

Detailed Concepts

The following is additional detail, but not meant to be exhaustive, to support many of the bulleted items/concepts discussed above.

Ensuring Schools and Libraries Have Affordable Access to 21st Century Broadband that Supports Digital Learning

The FCC has already determined the importance of HSB in the homes of students, as well as all citizens of the United States where possible, with the Connect America program and the other Universal Services programs. Deploying HSB to only eligible schools and libraries could be a duplication of effort and therefore not cost effective. Short of the FCC, Other Federal, State and local agencies stepping back and looking at a national effort similar to that of the National Highway System, the FCC should direct this current NPRM to the eligible schools' and libraries' immediate HSB needs that are likely to be available within the next 3 to 5 years. A national effort could then be devised to adapt the relatively successful National Highway Systems, modernized and implemented in a High Speed Broadband (HSB) Rail System or Grid. This concept is not a new concept to this discussion but should be considered. The FCC, through input from all submissions to this NPRM, should focus on the preparation of the schools and libraries to connect to such a mechanism for the provision of HSB at the middle mile stage of access. School Systems should seek the implementation of scalable local area networks, wide area networks (where applicable) and other identified E-Rate services necessary to provide needed broadband at speeds currently available up to (or beyond) the needed impending HSB in the future such as the metric of 1GB per 1000 users as suggested by SETDA. The actual needs assessment should be made by the applicant.

Unused portions of services bought just to meet a program pre-assigned metric may not be cost effective and may appear to be wasteful.

The need of HSB in the classrooms, schools, universities, colleges, business/corporations, governmental offices and homes has constantly been compared to the use of electricity, POTs and other utilities.

Relatively, these services have been provided through various funding sources resulting in grids and infrastructures designed to provide the services at “reasonable” costs that depend on the amount of usage by customers. It is not completely out of line for the FCC to research and deploy, if determined feasible, such an adaptation of HSB in the same manner.

[Focusing E-rate Funds on Supporting Broadband to and within Schools and Libraries](#)

We applaud the effort to focus the E-Rate program on High Speed Broadband (HSB) connections but would discourage the FCC from focusing on the Eligible Services List, as we know it today and begin looking at services and equipment that are eligible for discounts and support the program Goals.

However, the crux of the matter is the oversubscription of E-Rate funding requests in both the traditional priorities described in the current Eligible Services List. The FCC has the daunting task of addressing this and expanding the HSB needs of the E-rate Program’s applicants.

If the Goal of the NPRM is the access of HSB, then services and resources necessary to distribute HSB to the classroom should be a top priority. If a classroom in a school building is unable to access the needed educational resources delivered by HSB, then the provisions for HSB outside the school are moot. The FCC should concentrate on providing discounts and encouraging States to support the effort in both an administrative support and financial manner for equipment, installation and configuration necessary for

a scalable local area network. The construction of these LANs should focus upon HSB access through wireless LAN equipment but it should also include modest provisions for wired or fiber connections to the desktop or related equipment but not to the extent that duplicated access is deployed.

In general, the next level of access of HSB would be a Wide Area Network connecting the schools within a school system (LEA). While the development and construction of a scalable LAN to meet future HSB may be challenging, the connection of the LAN(s) to a Wide Area Network (WAN) that is scalable to meet the HSB metrics presents a bit more of a challenge for schools and school districts. Most schools in Alabama currently deploy their Internet Bandwidth to their schools through a WAN. It is important to understand that the WAN is just the connection of the pipes that carry two way information communications from one school to the SEA offices to another school throughout the WAN depending on the WAN configuration. The final level, at least as the proposed methods in this response, is the Internet access bandwidth that is then distributed, where needed, through the WAN to the schools and ultimately to the students in the school. This is where the configurations become challenging based on current availability. These mechanisms may or may not be scalable to the future needs of HSB. If a school system determines that the curriculum efforts of a specific school located on the WAN is that of 5GB, then it might be possible that the specific WAN connection should be 5GB or more depending on the local school related information traffic that shares the WAN connection to that specific school. Currently and possibly within the next 3-5 years, this amount of connectivity may not be available to the school to meet the needs. Therefore, the school system will need assistance in deploying mechanisms, policies and procedures on their networks that will better utilize the bandwidths that are available. It should be recognized that offering Priority 1 discounts on these devices may open a flood of valid efficient/effective devices that could be deployed to any given LAN and or WAN. However, based on prior experience there may be some risk level of waste. Therefore, we would ask the FCC to make predeterminations with manufacturers and provide transparent LAN/WAN pre-requisites for any

suggested eligible service or equipment to be deployed. If in fact the needed level of HSB is available for the WAN connections and it is scalable to those future needs, then the school system should be provided eligible E-rate discounts for the services as needed, but not for the excess that may be available. If a school system cannot obtain WAN connection for a school(s) in a cost effective manner then the current policy for the acquisition of WAN services should still be considered. Additionally, the current FCC stance in the matter of dark fiber acquisition for WAN or HSB Internet related bandwidth transport should also stand. Because the market in HSB should improve over the next 3-5 years, it should be preferred that WAN and IA transport are leased in order to be eligible for discounts. Only in extreme conditions should a bandwidth connection installed and owned by an applicant be considered for E-Rate discounts. In these cases the FCC should look to that state's SEA, Connect-America Administrator and other organizations that are capable of advising the FCC and assisting with other economical solutions.

In the matter of E-Rate Discounts, discount for Internet Access to the WANs deploying HSB capabilities the ALSDE is concerned with the actual metric of 1GB per 1000 students. To meet this metric, as stated, today in Alabama an amount of 744GB of market Internet Access would be needed. As a State if we additionally deploy Internet access bandwidth to meet the needs of homes, business/corporations, and government facilities then that amount would be far greater.

In any of these Priority services (or others), if the schools system can participate in a statewide procurement or consortia to obtain the equipment and/or services needed, then they should be encouraged to do so. If the SEA and/or a consortia recognized by the SEA or other State Agency offers statewide procurement for equipment and/or services, eligible or not, the applicant who participates in these massive procurement efforts in order to seek additional volume pricing discounts for eligible equipment and/or services should be allowed to do so. The encouragement from the FCC for applicants to participate in these procurement programs could be the allowance for an additional amount of 10%

in eligible discount levels not to exceed a defined FCC total - of say 85%- in discounts if the applicant doesn't obtain funding in a separate duplicated application. The overall savings provided through the use of a statewide procurement should cover the FCC's expense in the provision of specified additional discounts. The State then could follow the lead of the FCC by providing additional funding to meet a portion or all of the E-Rate match required.

These massive procurement efforts should be made at the State level as various States have different laws related to procurement and bidding. Also, most statewide procurements are made to increase the volume of purchases as they include various State agencies and other related groups that are not typically eligible for E-rate discounts. The FCC should NOT discourage these procurement resources.

In an effort to extend the amount of the E-rate cap available for the HSB efforts mentioned above, the ALSDE would support lowering discounts versus the complete removal of discounts on other traditional Priority 1 Services for traditional telephone services including wireless (considering removal of bundling capabilities). However, it should be noted that since the initial stages of the E-rate program in 1998, the Alabama Public K-12 applicants have been encourage to apply for E-rate discounts on all needed and eligible services and equipment. They were basically encouraged that if they have a need for the services and/or equipment, are planning to purchase the equipment or services and have the funds to purchase the needed services or equipment within the upcoming E-Rate Funding Year then they should make an E-rate application for those services and/or equipment and use the discounts received to purchase other needed educational related technologies that are not eligible for E-rate discounts. In some cases over the years the discounts received for Priority 1 were used as the match for rarely funded Priority 2 applications. This was believed to be the intent of the E-rate program at least here in Alabama. Apparently, many of our Alabama applicants have continued to adhere to this intent and to this date they are still using the discounts received for primarily these Priority 1 services in question to make technology purchases. In some cases they accumulate these discount funds, often an important part of

their technology budget, received for years to make planned purchases in educational technology. A lowering of the discount level would not be preferred, but a complete removal would be even more difficult for Alabama applicants.

The ALSDE agrees with the immediate removal of the *Outdated Services* listed in the NPRM.

Many of our school systems apply and obtain discounted web hosting services and have grown dependent on these services to provide information about the school system and schools as well as a communication tool for parents and the community. The ALSDE has recognized some unusual growth in the cost of web hosting as compared to hosting services available to, but not limited to, the general public, business/corporate entities, and community organizations. However, the elimination of web hosting services that meet the equivalent needs of a school system would not be preferred.

Ensuring Equitable Access to Limited E-rate Funds

Modifying the Discount Matrix:

The ALSDE does support the modification of the Discount Matrix to some extent to ensure more equalized funding among all applicants across all designated priorities of the program. Many submitting organizations have suggested the same. However, if there is an increase of services eligible for Priority 1 services as a result of this NPRM, it should be recognized that the probability of requested discounts for Priority 1 services will rise as well. The FCC should visit variations of the discount matrix to include possible flat discount rates for non HSB Priority 1 and any remaining Priority 2 eligible services similar to the flat discounts suggested by SECA. The use of the Flat discount for these services could serve as two

advantages freeing up needed discount funding for HSB Priority 1 Services and Equipment as well as simplifying the application process.

Support Based on District-Wide Eligibility and Application by School District:

We agree that the use of a simple district wide discount calculation to be used for all schools and eligible facilities under the school districts umbrella would free up funding for HSB Priority 1 Services. Further study of the effect that the combination of this and the lowering of the discounts as determined by a newly modified discount matrix will have upon those schools located within county/parish school districts. As stated before, many of these schools and school districts use the discount to fund technology purchasing.

The FCC should consider, to the extent the law requires, the removal of an urban vs. rural discount. However, if the FCC continues to include the provision of rural/urban identification then the ALSDE supports the use of a new rural/urban indicator. We encourage the FCC to further develop collaboration with the USDOE and the use of the USDOE's NCES definitions with the caveat that the FCC encourage the USDOE to update this data as soon as it is possible based on the business rules that are used to develop the file.

Setting Budget Limits:

It is thought that the suggested changes to the ESL, discount matrix and other current rules would be more beneficial for the applicants rather than to deploy a per student allocation similar to block grants.

We agree with SECA and others that this method should not be deployed in distributing any E-Rate funds. A one size fits all method of funding will not benefit the E-rate program. However, if the FCC should determine this method is to be further analyzed then we would suggest a detailed and extensive

collaboration effort of all SEA's (representing the schools' and school systems' educational needs), the USDOE, libraries and other knowledgeable associations/entities in the research and development of such a deployment.

More Equitable Access to Funding for Internal Broadband Connections:

The revision of the ESL to include those services and equipment necessary to provide Priority 1 HSB access has been discussed earlier. However, we agree that the two-in-five has not met its original intent. However, the ALSDE does suggest that the inclusion of certain LAN equipment and installation under the Priority 1 HSB services may open the funding for some level of abuse or waste. Therefore a similar rule should be considered. Since most of these networks, as a whole, are generally stable and usable for long periods of time but may require occasional updates. We suggest that in the event such updates are required, these updates be applied to a Priority 2 level of funding and should not exceed total request of more than 25% of that establishing application over a period of 5 years.

The FCC could implement a rolling cycle as described by SECA that would fund a unique prescribed set of applicants for this service each year for a period of 3-5 years until all applicants obtain the services related to eligible Priority 1 HSB LAN. The FCC could provide latitude with respect to application timing for those new school building construction projects to include the eligible HSB LAN equipment within the construction of the building(s) versus the installation after the building has been built just to meet E-rate timelines.

After reflection of our response so far, the ALSDE would consider the removal of the traditional E-rate Priority distinctions. Addressing the priority of an eligible service or equipment at the discount level assigned to that particular service or equipment could possibly be a boon for the program. Placing higher discounts available to those services and products determined necessary to provide HSB services directly to the student and lower discounts on services that may be considered "not so direct." If

developed properly with input from all stakeholders this concept could help in the streamlining of the application process as well.

Broadband Planning and Use:

Throughout our comments so far we have indicated the applicant should continue to determine their own individual needs. We would encourage the FCC to revisit the usefulness of a technology plan and put more weight on this requirement. Additionally, in some instance of a newly developed application process it may be prudent for the FCC to ask the applicant questions including but not limited to, the following:

How will this service support the educational needs of their students?

How will the success of this service be measured?